



## **Discussion**

MCC supports the Commission's initiative in this proceeding to allow 931 MHz licensees other than nationwide network providers to operate base stations with up to 3500 watts ERP. The increase in allowable power levels will, indeed, result "...in efficiencies of scale, reductions in cost and resulting benefits for consumers."<sup>1</sup> Among the benefits which will be realized from the Commission's proposed rule changes are better building penetration and the need for less transmitters to cover a given geographic area. As to the latter point, this is not an insubstantial benefit. It is MCC's experience that one of the most significant problems encountered by all paging companies today is the ability to locate transmitter sites. Because of environmental concerns, restrictions are more frequently being placed on the location of radio sites resulting in the expenditure of greater resources to secure suitable sites. Thus, actions like the Commission has proposed herein, will enable 931 MHz paging carriers to provide the best possible technical service at the lowest possible cost.

In addition to the foregoing, MCC's experience in operating 931 MHz transmitters on a wide-area basis, suggests that there is not likely to be any adverse interference created by the operation of 931 MHz transmitters at 3500 watts ERP as long as paging carriers adhere to the Commission's height/power rules.

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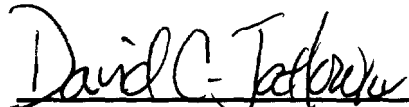
<sup>1</sup> Notice of Proposed Rulemaking and Order Granting Petition for Waiver, 8 FCC Rcd 2796, released April 23, 1993, at para. 6.

## **Conclusion**

MCC applauds the Commission's proposal to allow Part 22 licensees to utilize up to 3500 watts ERP since it will provide many benefits to 931 MHz licensees and their subscribers without any harm to the public interest.

Respectfully submitted,

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